

Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Henry R. Darwin
Director

via e-mail

March 18, 2015
FPU15-171

Ms. Catherine Jerrard
AFCEC/CIBW
706 Hangar Road
Rome, NY 13441

RE: WAFB – ADEQ Comments – *Draft Soil Vapor Extraction System Operation and Maintenance Report January Thorough March 2014 Former Liquid Fuels Storage Area, Site ST012 Former Williams Air Force Base Mesa, Arizona*; prepared for Air Force Civil Engineer Center AFCEC/CIBW, Lackland AFB, Texas; prepared by Amec Foster Wheeler Environmental & Infrastructure, Phoenix, Arizona; document dated February 18, 2015

Dear Ms. Jerrard:

Arizona Department of Environmental Quality (ADEQ) Federal Projects Unit (FPU) and ADEQ contractor UXO Pro, Inc. reviewed the above-referenced document. General and Specific Comments are provided below.

General Comments

1. Please attempt to accelerate contaminant release and remedial action reporting. Assessing relevant and timely data will assist in proving public and environmental protectiveness. This report summarizes SVE remedial system O&M activities for the first quarter of 2014, essentially one year preceding the report distribution.
2. (A) Please provide additional laboratory information.
(B) Please provide root cause analysis for discrepancy.
(C) Please provide action plan to resolve current, and minimize future, issues.
(D) Please complete additional sampling and reporting at earliest reporting interval.

The report documents disparities between analytical results conducted by Test America (for data collected through October 2013) and the Test America subcontractor, ALS Environmental (for data collected from November 2013 to March 2014). The report states that laboratory split samples will be collected during the subsequent reporting period for analysis at two additional laboratories.

3. (A) Please provide a more detailed discussion of the method used to calculate mass removal and the effects of using the higher laboratory reported values.
- (B) Please explain the molecular weight discrepancy between the laboratory ppmV calculation and molecular weight to calculate ppmV noted in the report.

The laboratory reports that the ppmV values are based on a TPH molecular wt. of 100. Note (c) below Table 3-3 indicates that TPH mass is calculated based on a molecular wt. of 106.168 for JP-4, which would result in ppmV values that are 5-6% lower than those reported by the lab.

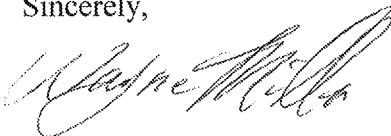
Specific Comments

1. Page 2-3, Table 2-2 – Remove the phrase “on 14 March 2014” from the first column, rows 4 and 5, as the associated data refers to two separate time periods.
2. Properly complete the Chain of Custody (COC). Laboratory chain-of-custody no. 280-228-725.1 for the influent sample collected on 1/24/14 does not include the Test America (TAL) name in the Company field at the bottom of the COC. In the future, this field should be completed to make it clear that the samples were transferred directly from TAL to the subcontracted lab.
3. Please correct validation references. The Data Validation Report introductory section describes general validation procedures for field duplicates, trip blanks, rinsate blanks, and MS/MSD samples. But no samples appear to be collected.

ADEQ may add or amend comments if evidence to the contrary of our understanding is discovered at the referenced location; submitted or received information is determined to be inaccurate; if any condition was unknown to ADEQ at the time this document was signed; or if complementary regulatory agencies bring valid and proven concerns to our attention.

Thank you for the opportunity to review this document. Should you have any questions regarding this correspondence, please contact me by phone at (602) 771-4121 or e-mail miller.wayne@azdeq.gov.

Sincerely,



Wayne Miller
ADEQ Project Manager
Federal Projects Unit
Remedial Projects Section
Waste Programs Division

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	ADEQ Reading and Project File	